

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 4:14CR246 AGF/NAB
v.)	
)	
THOMAS GREGORY ANDERSON, JR.,)	
)	
Defendant.)	

**DEFENDANT ANDERSON'S MOTION FOR EXTENSION OF TIME
WITHIN WHICH TO FILE PRETRIAL MOTIONS**

COMES NOW Defendant, Thomas Gregory Anderson, Jr., by and through his attorneys, Arthur S. Margulis, William S. Margulis, and Capes, Sokol, Goodman & Sarachan, P.C., and in support of his Motion for Extension of Time Within Which to File Pretrial Motions states as follows:

1. That Defendant is charged with one violation each of Title 21 U.S.C. §846 and Title 18 U.S.C. §1956.
2. That Defendant was arraigned on August 27, 2014.
3. Prior to this motion, Defendant Anderson has been granted two extensions within which to file pretrial motions.
4. The most recent court order filed December 3, 2014, concerning pretrial motions, granted Defendant's motion and set January 15, 2015 as a deadline within which to file said motions.
5. That Defendant has recently retained the undersigned counsel to represent him in this matter going forward.
6. Counsel has entered their appearance in this matter.

7. That Defendant's new counsel has obtained discovery from Defendant's previous counsel and said discovery is voluminous in nature.

8. That on September 26, 2014, the U.S. Magistrate entered a Complex Case finding pursuant to Title 18 U.S.C. §3161(h)(7)(A)(B)(i)(ii) (Doc. 157).

9. That counsel for Defendant has discussed this matter with the Assistant United States Attorney for the Government, John Davis, and Mr. Davis has indicated that he has no objection to Defendant's motion made herein.

8. That this motion is not made for the purposes of unnecessary delay.

WHEREFORE Defendant prays that this Honorable Court grant his Motion for Extension of Time, and enter an order granting the Defendant an additional 45 days within which to file pretrial motions, and for such further orders as the Court deems just and proper.

Respectfully submitted,

Capes, Sokol, Goodman & Sarachan, P.C.

/s/ William S. Margulis
ARTHUR S. MARGULIS, #16906MO
WILLIAM S. MARGULIS, #37625MO
7701 Forsyth Blvd., 12th Floor
St. Louis, MO 63105
Telephone: 314.721.7701
Facsimile: 314.721.0554
amargulis@capessokol.com
wmargulis@capessokol.com
ATTORNEYS FOR DEFENDANT

Certificate of Service

I hereby certify that on January 15, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Office of the United States Attorney and all other counsel in this case.

/s/ William S. Margulis